

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

*All Cases Noted on Attached Appendix A*

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO WEST VIRGINIA WALGREENS SETTLEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff West Virginia Subdivisions identified in Appendix A (collectively, “Dismissing WV Plaintiffs”) and Defendant Walgreens (together with the Released Entities, “Walgreens”<sup>1</sup>) that, pursuant to the election of each Dismissing WV Plaintiff to participate in the Walgreens West Virginia Settlement attached hereto as Appendix B, all claims of each Dismissing WV Plaintiff against any Released Entity that is a defendant in any action listed in Appendix A are hereby voluntarily **DISMISSED WITH PREJUDICE**, with each party to bear its own costs.

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<sup>1</sup> The Walgreens West Virginia Settlement is between the State of West Virginia and Walgreens, but the settlement provides for participation by the Dismissing WV Plaintiffs conditioned on their agreement, among other things, to release and dismiss their claims against all “Released Entities,” which includes Walgreens Boots Alliance, Inc., Walgreen Co. and Walgreen Eastern Co., Inc. Appendix B § II.GG.

Dated: September \_\_, 2023

Respectfully submitted,

Agreed as to form and substance:

**WALGREENS**

/s/ Kaspar J. Stoffelmayr \_\_\_\_\_  
Kaspar J. Stoffelmayr  
Katherine M. Swift  
BARTLIT BECK LLP  
54 West Hubbard Street Chicago, IL  
60654 (312) 494-4400  
kaspar.stoffelmayr@bartlitbeck.com  
kate.swift@bartlitbeck.com

**DISMISSING WV PLAINTIFFS**

/s/ John D. Hurst \_\_\_\_\_  
Joseph F. Rice  
Anne McGinness Kearse  
Motley Rice  
28 Bridgeside Blvd.  
Mount Pleasant, SC 29464  
843-216-9000  
843-216-9450 (fax)  
jrice@motleyrice.com  
akearse@motleyrice.com

John D. Hurst  
Motley Rice  
50 Clay Street, Suite 1  
Morgantown, WV 26501  
304-413-0457  
jhurst@motleyrice.com

*Counsel for*  
*Charleston City (1:18-op-45224)*  
*Clendenin Town (1:18-op-46127)*  
*Dunbar City (1:18-op-45546)*  
*Eleanor Town (1:18-op-45387)*  
*Granville Town (1:18-op-45320)*  
*Huntington City (1:17-op-45054)*  
*Huntington City (1:18-op-45984)*  
*Hurricane City (1:18-op-45293)*  
*Milton City (1:18-op-45321)*  
*Nicholas County (1:18-op-45314)*  
*Saint Albans City (1:18-op-45269)*  
*Smithers City (1:18-op-45319)*  
*Sophia Town (1:18-op-46129)*  
*Summersville City (1:18-op-45316)*  
*Winfield City (1:18-op-45294)*

/s/ Anthony J. Majestro

Anthony J. Majestro  
Powell & Majestro  
Ste. P1200  
405 Capitol Street  
Charleston, WV 25301  
304-346-2889  
304-346-2895 (fax)  
amajestro@powellmajestro.com

*Counsel for*

*Cabell County (1:17-op-45053)*  
*Fayette County (1:17-op-45062)*  
*Kanawha County (1:17-op-45052)*  
*Wayne County (1:17-op-45052)*

/s/ Andrew C. Skinner

Andrew C. Skinner  
Laura C. Davis  
Macon Bryan Epps Gray  
Stephen G. Skinner  
Skinner Law Firm  
P.O. Box 487  
Charles Town, WV 25414  
301-725-4029  
304-725-4082 (fax)

*Counsel for*

*Berkeley County (1:17-op-45171)*  
*Charles Town City (1:18-op-45332-DAP)*  
*Jefferson County (1:19-op-45087-DAP)*

/s/ Christopher M. Davis

Christopher M. Davis  
Wooton Davis Hussell & Ellis  
201 North Kanawha Street  
PO Box 2600  
Beckley, WV 25802  
304-255-2188  
304-255-2189 (fax)  
chris.davis@wwdhe.com

*Counsel for*

*Raleigh County (18-op-45108)*

/s/ Aaron L. Harrah

Aaron L. Harrah  
Hill, Peterson, Carper, Bee & Deitzler  
500 Tracy Way  
Charleston, WV 25311  
304-345-5667  
Fax: 304-345-1519  
aaron@hpcbd.com

*Counsel for*  
*Greenbrier County (19-op-45080)*  
*City of Vienna (19-op-45042)*

SO ORDERED this \_\_\_\_ day of September 2023.

\_\_\_\_\_  
Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on September 12, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will notify counsel of record regarding the filing.

/s/ John D. Hurst